

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STEVEN ARONSON, MATTHEW
ARONSON,

Plaintiffs,

v.

JJMT CAPITAL LLC, a Delaware limited
liability company, JACOB WUNDERLIN,
MATTHEW SCHWEINZGER, JOSEPH
DEALTERIS, TYLER CROOKSTON,

Defendants.

Case No. 1:21-CV-01867

Hon. Franklin U. Valderrama

Magistrate Susan E. Cox

JOINT STATUS REPORT

Pursuant to this Court's Orders dated July 13, 2022 (ECF Nos. 99, 100), the parties submit the following joint status report:

The parties were last before the Court on July 13, 2022, for hearings on cross-motions to compel discovery and/or for a protective order (ECF Nos. 78, 80) and Defendant Crookston's Motion to Stay in light of the receivership in the related case *SEC v. Horwitz, et al.*, Case No. 2:21-cv-2927-CAS-GJS (C.D. Cal.) (ECF No. 59).

Counsel for the Receiver participated on the calls during both hearings on July 13, 2022 and advised the Court that the parties would be attempting to mediate a global resolution of this case, along with six other related cases pending in the Northern District of Illinois and/or the Circuit Court of Cook County against some combination of these same Defendants. In light of these global settlement efforts, the Receiver's counsel suggested the Court enter and continue the Motion to Stay and wait 90 days to re-schedule new fact discovery deadlines in this case.

Judge Valderrama granted a stay for 90 days until October 11, 2022. ECF No. 100. The Court also terminated the pending motion to stay, as well as Defendants' then-pending motions to

dismiss (ECF Nos. 29, 46), with leave to re-file the motions if parties did not resolve this case through the global settlement negotiations. *Id.*

Since July 13, 2022, the parties have agreed to a mediation through JAMS with the honorable Sidney I. Schenkier (Ret.). Judge Schenkier is not available until after Thanksgiving, however, and the parties are working to schedule the mediation for a date in December 2022 or January 2023.

In light of the ongoing global settlement efforts, and in an effort to conserve resources during those negotiations, the parties are working to create an agreed upon framework for the production of certain documents related to the Order Compelling the Production of documents from Tyler Crookston (ECF No. 99) in advance of the mediation, but are otherwise working together to limit the cost and expense of discovery that may prove unnecessary. Accordingly, the parties would appreciate if the Court waits until after the mediation to re-schedule fact discovery deadlines, if necessary.

Respectfully submitted,

MATTHEW ARONSON and STEVEN
ARONSON

JJMT, LLC

/s/ Daniel S. Rubin

By One of Their Attorneys

/s/ Howard Rosenberg

By One of Its Attorneys

Daniel S. Rubin ARDC #6293669
Scott Frost ARDC #6208276
Howard & Howard Attorneys PLLC
200 S. Michigan Avenue, Suite 1100
Chicago, Illinois 60604
Phone: (312) 372-4000
Fax: (312) 939-5617
sfrost@howardandhoward.com
drubin@howardandhoward.com

Howard Rosenberg ARDC#6256596
KOPECKY SCHUMACHER
ROSENBURG LLC
120 N. LaSalle St., Ste. 2000
Chicago, IL 60602
(312) 380-6631
hrosenburg@ksrlaw.com

JACOB WUNDERLIN, MATTHEW
SCHWEINZGER, and JOSEPH DEALTERIS

/s/ Matthew S. Ryan

By One of Their Attorneys

Terence H. Campbell ARDC#6228959
Matthew S. Ryan ARDC#6278362
John N. Pavletic, Jr. ARDC#6330271
COTSIRILOS, TIGHE, STREICKER,
POULOS & CAMPBELL, LTD.
33 N. Dearborn St., Ste. 600
Chicago, IL 60602
(312) 263-0345
mryan@cotsiriloslaw.com

TYLER CROOKSTON

/s/ Jena L. Levin

By One of His Attorneys

Margaret G. Nelson ARDC#6269798
Ellen M. Wheeler ARDC#6244111
Jena L. Levin ARDC#6300341
FOLEY & LARDNER LLP
321 N. Clark St., Ste 3000
Chicago, IL 60654
(312) 832.4500
mnelson@foley.com
ewheeler@foley.com
jlevin@foley.com